

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

WASHINGTON
NEW YORK
SAN FRANCISCO
LONDON
BRUSSELS

JOHN E. BIES
TEL 202.662.5207
JBIES@COV.COM

July 12, 2005

Via Overnight U.S. Mail

Mr. Ernie Santiago
#90304-038
FCI McKean Unit D-A
P.O. Box 8000
Bradford, PA 16701

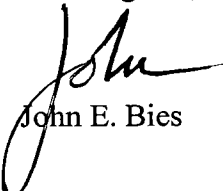
Re: Santiago v. LaManna, C.A. No. 02-4056
Third Circuit Appeal

Dear ^{Ernie}~~Mr. Santiago~~:

As we discussed, enclosed please find a draft motion to recall the mandate and for reconsideration, as well as a draft declaration for you. As we discussed, please review the declaration for accuracy and fill in the missing dates, sign and date it, and return the signed copy to me. I have sent a letter to Ms. Tronetti requesting that they provide you with access to your legal materials and to set up a time next week to discuss. I have also enclosed a self-addressed envelope for you to return materials to me.

I hope all is well with you.

Best Regards,


John E. Bies

Enclosures.

*Please return the signed
declaration at your
earliest convenience.*

*If you make edits to the first two
pages, I can correct them in
the fourth.*

Exhibit I

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

WASHINGTON
NEW YORK
SAN FRANCISCO
LONDON
BRUSSELS

JOHN E. BIES
TEL 202.662.5207
JBIES@COV.COM

July 12, 2005

By Overnight U.S. Mail

Deanna M. Tronetti
Unit Manager, Unit D-A
FCI McKean
P.O. Box 5000
Bradford, PA 16701

Re: Ernie Santiago, Inmate No. 90304-038

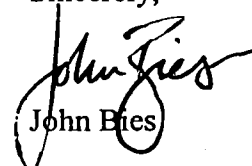
Dear Ms. Tronetti:

I am writing with two requests in connection with my representation of Mr. Santiago. First, in connection with an upcoming legal filing, I need Mr. Santiago to forward to me certain legal materials from his earlier filings. I understand that Mr. Santiago is currently in administrative segregation and has limited access to his legal materials. I would appreciate it if you could please arrange with Lt. Glenn for Mr. Santiago to have sufficient time to review his legal materials and identify the materials necessary to completing his current motion at your earliest convenience, so that he might forward those materials to me. I appreciate your assistance in this matter. Please contact me if there are any issues.

Second, by this letter, I also hope to arrange for an appointment for a telephone conference with Mr. Santiago next week to discuss this legal filing, once he has had an opportunity to review his legal materials. I would hope to have a call with Mr. Santiago next Tuesday, July 19, at 10:00 am. If that time is inconvenient, please contact me to arrange an alternative time at (202) 662-5207 or by e-mail at "jbies@cov.com." I am generally available after 9:30 am on Tuesday, and if Tuesday is inconvenient, I am also available any time Wednesday, July 20.

I appreciate all of your assistance with these matters. Please let me know if you have any questions or if there are any issues with my requests. Thanks again.

Sincerely,


John Bies

cc: Mr. Ernie Santiago

Exhibit I

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

WASHINGTON
NEW YORK
SAN FRANCISCO
LONDON
BRUSSELS

JOHN E. BIES
TEL 202.662.5207
JBIES@COV.COM

August 4, 2005

By Overnight U.S. Mail

Deanna M. Tronetti
Unit Manager, Unit D-A
FCI McKean
P.O. Box 5000
Bradford, PA 16701

Re: Ernie Santiago, Inmate No. 90304-038

Dear Ms. Tronetti:

Thank you for your assistance in arranging a telephone conference with Mr. Santiago today. I am writing with an additional request in connection with my representation of Mr. Santiago. In connection with an upcoming legal filing, I need Mr. Santiago to forward to me one important motion from his earlier filings. Because this motion was filed several years ago and was filed *pro se*, Mr. Santiago's legal papers are the only source for me to obtain a copy of this motion. I need a copy of this particular motion in order to complete his current filing. I understand that Mr. Santiago is currently in administrative segregation and has limited access to his legal materials. I also understand that Mr. Santiago has a large number of legal papers, and has had difficulty locating this particular motion. I would appreciate it if you could please, at your earliest convenience, arrange with Lt. Glenn for Mr. Santiago to have the time to review his legal materials necessary to locate this motion, so that he might forward those materials to me. I appreciate your assistance in this matter.

Please contact me if you have any questions or if there are any issues in connection with this request. I appreciate all of your assistance with this matter. Thanks again.

Sincerely,

John E. Bies

cc: Mr. Ernie Santiago
#90304-038
FCI McKean Unit D-A
P.O. Box 8000
Bradford, PA 16701

Exhibit J